



**CITY OF ANNAPOLIS, MARYLAND
MUNICIPAL SEPARATE STORM
SEWER SYSTEM (MS4) PROGRAM
INSPECTION REPORT**

**DEPARTMENT OF NEIGHBORHOOD AND
ENVIRONMENTAL PROGRAMS
160 DUKE OF GLOUCESTER STREET
ANNAPOLIS, MD 21401**

Report Date: May 2014

Field Activity Dates: December 12–13, 2013

**U.S. Environmental Protection Agency, Region III
Water Protection Division
Office of NPDES Enforcement (3WP42)
1650 Arch Street
Philadelphia, PA 19103**

(This page intentionally left blank.)

DOCUMENTS CITED IN REPORT

Shortened Name	Document Title and Date
City Code	City of Annapolis Municipal Code
EPA Records Request	List of documents that the EPA Inspection Team requested from the City on November 27, 2013
Permit	<i>National Pollutant Discharge Elimination System General Permit for Discharges from Small Municipal Separate Storm Sewer Systems, General Discharge Permit No. 03-IM-5500 (General NPDES Permit No. MDR05500), effective April 14, 2003</i>
City Response Inventory	Inventory of documents provided by the City in response to the EPA Records Request
2003 NOI Review	MDE's review of the City's Notice of Intent
Sediment Control Subtitle	Maryland Environment Article, Title 4, Subtitle 1, <i>Annotated Code of Maryland</i>
Erosion and Sediment Control Ordinance	City Code, <i>Chapter 17.08, Grading, Erosion, and Sediment Control</i>
Stormwater Management Subtitle	Maryland Environment Article, Title 4, Subtitle 2, <i>Annotated Code of Maryland</i>
Industrial General Permit	MDE's <i>General Discharge Permit for Stormwater Associated with Industrial Activities</i> (Discharge Permit No. 02-SW)

ACRONYMS AND ABBREVIATIONS USED IN REPORT

Abbreviation	Corresponding Term
AACPS	Anne Arundel County Public Schools
ABC	alcoholic beverage control
ADOT	Annapolis Department of Transportation
BMP	best management practice
CIP	capital improvement plan
COMAR	Code of Maryland Regulations
DNEP	Department of Neighborhood and Environmental Programs
DPW	Department of Public Works
EPA	[United States] Environmental Protection Agency
ESC	erosion and sediment control
ESD	environmental site design
GIS	geographic information system
HOA	homeowners' association
IDDE	illicit discharge detection and elimination
MDE	Maryland Department of the Environment
MEP	maximum extent practicable
MS4	municipal separate storm sewer system
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
SCD	Soil Conservation District
SOP	standard operating procedures
SWM	stormwater management
SWPPP	stormwater pollution prevention plan

EXECUTIVE SUMMARY

From December 12 through 13, 2013, a compliance inspection team comprised of staff from the U.S. Environmental Protection Agency (EPA) Region III and EPA's contractor, PG Environmental, LLC (collectively the EPA Inspection Team), inspected the municipal separate storm sewer system (MS4) program of the City of Annapolis, Maryland (the City).

Discharges from the City's MS4 are regulated by the Maryland Department of Environment (MDE) National Pollutant Discharge Elimination System (NPDES) *General Permit for Discharges from Small Municipal Separate Storm Sewer Systems*, General Discharge Permit No. 03-IM-5500, General NPDES Permit No. MDR055500 (the Permit), effective April 14, 2003. The Permit was set to expire on April 14, 2008, but was administratively extended by MDE until a new permit is issued.

The purpose of this inspection was to obtain information to assist EPA in assessing the City's compliance with the requirements of the Permit, as well as the implementation status of its current MS4 program.

Based on the information obtained and reviewed, the EPA Inspection Team made several observations concerning the City's MS4 program related to the specific Permit requirements evaluated. Table 1 summarizes the Permit requirements and the observations made by the inspection team.

Table 1. Summary of Permit Requirements and Inspection Observations

Permit Requirement	Observations
Permit Part III.C.1 (MS4 Mapping)	Observation 1. At the time of the inspection, multiple assets observed in the field during the onsite inspection were not included in the City's GIS-based map.
Permit Parts III.C.3–4 (Field Screening and Source Identification)	Observation 2. It appears that the City had not developed procedures for field screening storm drain outfalls on a consistent basis. Observation 3. It appears that the City had not developed inspection procedures for identifying the source of observed illicit discharges to the MS4.
Permit Part III.C.5 (Enforcement)	Observation 4. It appears that the City does not have IDDE enforcement and penalty procedures in the event of a prohibited non-stormwater discharge to the MS4.
Permit Part III.C.8 (Non-Stormwater Discharges)	Observation 5. The EPA Inspection Team observed a discharge of vehicle wash water to a storm drain inlet at the Annapolis Department of Transportation (ADOT) Facility during a site visit conducted on December 12, 2013.

Table 1. Summary of Permit Requirements and Inspection Observations

Permit Requirement	Observations
Permit Part III.D – COMAR 26.17.01.09 (Inspection and Enforcement)	<p>Observation 6. It appears that the City is not inspecting sites with approved erosion and sediment control plans an average of once every two weeks.</p> <p>Observation 7. At the time of the inspection, the City was not preparing written inspection reports or notifying the on-site personnel and the owner/developer in writing when violations were observed at construction sites.</p> <p>Observation 8. At the time of the inspection, the City did not have an enforcement response plan or other procedural document describing when and how enforcement is to be escalated and how penalties are to be assessed.</p> <p>Observations 9-12. The EPA Inspection Team observed issues related to construction site stormwater runoff at the following sites: (1) Annapolis Elementary School, (2) 1109 Boucher Place, (3) Village Green Development, (4) 801 Banneker Lane, (5) Mills-Parole Elementary School, and (6) East Port Fire Station.</p>
Permit Part III.E – COMAR 26.17.02.11 (Inspection and Maintenance)	<p>Observation 13. At the time of the inspection, the City was not ensuring preventive maintenance through inspection of all stormwater management systems during the first year of operation and then at least once every 3 years after.</p> <p>Observations 14-17. The EPA inspection team observed issues related to post-construction stormwater management at the following sites: (1) Taylor Avenue Stormwater Management Pond; (2) Truxtun Park BMPs; (3) Harness Creek View Stormwater Management Pond; (4) 1292 Spa Road Rain Garden; and (5) Kneseth Israel and Aleph Bet School BMPs.</p>

Table 1. Summary of Permit Requirements and Inspection Observations

Permit Requirement	Observations
Permit Part III.F (Pollution Prevention/Good Housekeeping for Municipal Operations)	<p>Observation 18. At the time of the inspection, the City had not developed employee training materials that explain how to prevent and reduce pollutant discharges to the storm drain system from the DPW Operations Facility and ADOT Facility.</p> <p>Observation 19. It appears that the City had not developed pollution prevention or good housekeeping procedures for each of its municipal operations facilities.</p> <p>Observation 20. At the time of the inspection, the City had not ensured that all municipally owned activities are properly permitted under NPDES or other state or federal water pollution control programs.</p> <p>Observations 21-22. The EPA inspection team observed issues related to pollution prevention and good housekeeping at the following sites: (1) Spa Road Maintenance Facility Yard (DPW Operations); (2) Annapolis Department of Transportation Facility (ADOT).</p>

TABLE OF CONTENTS

	Page
INTRODUCTION	1
CITY OF ANNAPOLIS BACKGROUND.....	2
INFORMATION OBTAINED RELATIVE TO PERMIT REQUIREMENTS.....	2
MINIMUM CONTROL MEASURE 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PROGRAM	3
Permit Part III.C.1 (Storm Sewer System Map)	3
Permit Parts III.C.3–4 (Field Screening and Source Identification).....	3
Permit Part III.C.5 (Enforcement)	4
Permit Part III.C.8 (Non-Stormwater Discharges)	5
MINIMUM CONTROL MEASURE 4: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL PROGRAM.....	5
COMAR 26.17.01.09 (Inspection and Enforcement)	6
MINIMUM CONTROL MEASURE 5: POST-CONSTRUCTION STORMWATER MANAGEMENT PROGRAM.....	12
COMAR 26.17.02.11 (Inspection and Maintenance)	13
MINIMUM CONTROL MEASURE 6: POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS	16

- Appendix 1: Maryland Department of Environment General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (General NPDES Permit No. MDR055500)
- Appendix 2: Original City NOI for MS4 Program (dated October 14, 2003) and MDE's NOI Review
- Appendix 3: Inspection Schedule
- Appendix 4: Inspection Sign-In Sheets
- Appendix 5: Exhibit Log
- Appendix 6: Photograph Log
- Appendix 7: Document Log

(This page intentionally left blank.)

INTRODUCTION

From December 12 through 13, 2013, a compliance inspection team comprised of staff from U.S. Environmental Protection Agency (EPA) Region III and EPA's contractor, PG Environmental, LLC, (collectively the EPA Inspection Team) inspected the municipal separate storm sewer system (MS4) program of the City of Annapolis, Maryland (the City). The purpose of this inspection was to obtain information that will assist EPA in assessing the City's compliance with the requirements of the Permit, as well as the implementation status of its current MS4 program. Dry weather conditions were experienced throughout the inspection activities, though some snow remained on the ground surface from precipitation events prior to the onsite inspection.

A copy of the Permit is included as Appendix 1. A copy of the City's original MS4 Notice of Intent (NOI) submitted to MDE in 2003, which contains descriptions of measures for program compliance, and MDE's review of the NOI (hereinafter, 2003 NOI Review) is included as Appendix 2.

The EPA Inspection Team obtained its information through a series of interviews with representatives from the City, along with a series of site visits, record reviews, and field verification activities. The inspection schedule is presented in Appendix 3. The primary representatives involved in the inspection were the following:

City Representatives:	Mr. Frank Biba, Chief of Environmental Programs, Department of Neighborhood and Environmental Programs (DNEP)
	Ms. Maria Broadbent, Director, DNEP
	Mr. David Jarrell, Director, Department of Public Works (DPW)
	Ms. Marcia Patrick, Assistant Director, DPW
	Mr. Mike Bunker, Superintendent of Utilities, DPW
	Mr. Robert Couchenour, Services Superintendent, DPW
	Ms. Cindy Tact, Analyst, DPW
	Mr. Matthew Waters, Stormwater Engineer, DNEP
	Mr. Rob Savidge, Environmental Compliance Inspector, DNEP
	Mr. Charlie Brown, Lead Stormwater Inspector, DPW
	Mr. Josh Sturgill, GIS Technician
	Mr. Iain Banks, Transportation Planner, Annapolis Department of Transportation (ADOT)
	Mr. Tony Spencer, Superintendent, ADOT
EPA Representatives:	Ms. Kyle Zieba, EPA Region III
	Ms. Allison Graham, EPA Region III
EPA Contractors:	Mr. Bobby Jacobsen, PG Environmental, LLC
	Mr. Kort Kirkeby, PG Environmental, LLC

A sign-in sheet from the onsite inspection is included as Appendix 4.

CITY OF ANNAPOLIS BACKGROUND

The City encompasses less than 8 square miles, and according the 2010 U.S. Census, the total population of the City was 38,394. The City's MS4 discharges to multiple watersheds within the City, including Weems Creek, Spa Creek, College Creek, Back Creek, Harness Creek, Church Creek, Crab Creek and the South River.

City staff explained that its stormwater program is primarily implemented by two departments within the City: (1) Department of Neighborhood and Environmental Programs (DNEP), and (2) Department of Public Works (DPW). According to City representatives, the City's stormwater program is funded through a stormwater utility fee which was implemented approximately five years prior to the inspection. City staff stated that the utility fee was doubled within the past two years. The fee for private residential property owners is fixed at \$40 per year; however, a private residential landowner can qualify for a 50 percent fee reduction in the stormwater utility fee by installing a stormwater management feature on its property. The fee for commercial properties is based on the amount of impervious area. Commercial property owners can also qualify for a fee reduction with the installation of a stormwater management feature that is in accordance with state specifications.

INFORMATION OBTAINED RELATIVE TO PERMIT REQUIREMENTS

The EPA Inspection Team obtained documentation and other supporting information to evaluate compliance with the Permit prior to, during, and after meeting with City staff during the onsite inspection. Observations regarding the City's implementation of Permit requirements are presented in this report.

Referenced documentation used as supporting information is provided in [Appendix 5](#), Exhibit Log and photograph documentation is provided in [Appendix 6](#), Photograph Log. A complete list of documents obtained is provided in [Appendix 7](#), Document Log.

On November 27, 2013, the EPA Inspection Team formally provided the City with a written list of requested records (hereinafter, EPA Records Request; see [Appendix 5, Exhibit 1](#)), some of which were made available to the EPA Inspection Team prior to and during the onsite inspection. Following onsite discussions, the EPA Inspection Team requested additional program documentation via electronic mail on December 19, 2013. The City provided some, but not all of the additional documents in response to the request between the end of the onsite inspection and January 15, 2014. A follow-up email was sent to the City on January 23, 2014 to identify those items not provided, but the City was unresponsive to the follow-up email.

This report describes and outlines specific Permit requirements and associated observations made during the inspection. The format of the report follows the numeric system used in the Permit and is sequential. Sections of the Permit are restated with the observations concerning those requirements listed below. The Permit incorporates State regulations by reference under the construction and post-construction minimum control measures; therefore, in these sections of the report, the EPA Inspection Team also provides applicable regulatory requirements from the *Code of Maryland Regulations (COMAR)*.

MINIMUM CONTROL MEASURE 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PROGRAM

Permit Part III.C (Illicit Discharge Detection and Elimination) – Permittees shall develop, implement, and maintain a program to identify and eliminate illicit storm drain system connections and non-stormwater discharges to the maximum extent practicable. The program developed to satisfy this minimum control measure shall contain elements to field screen storm drain system outfalls, inspect the storm drain system for the purpose of identifying the source of any illicit discharges, eliminate any illegal connection or illicit discharge to the storm drain system, and enforce penalties where appropriate. The illicit discharge program shall also contain components to address illegal dumping and spills.

Permit Part III.C.1 (Storm Sewer System Map) – At a minimum, a program developed to implement IDDE to satisfy this control measure shall contain a map showing the extent of the storm drain system.

Observation 1: At the time of the inspection, multiple assets observed in the field during the onsite inspection were not included in the City’s GIS-based map. The City had developed a GIS-based map which includes multiple MS4 assets (e.g. storm drain inlets, outfalls, storm sewer pipes and post construction BMPs). The City’s GIS Technician explained that MS4 outfalls are generally represented on the map as the end of pipe segments and that the City has not assigned unique identifiers to individual assets within the GIS or “iWorQ” maintenance management system. Rather, assets are identified by a nearby street address. City staff stated that the GIS includes public infrastructure but does not include all infrastructure on private property. In addition, City staff stated that it maintains copies of as-built plans and design drawings for private construction, which could be accessed if needed.

Two storm drain inlets observed at the City’s Spa Road Maintenance Facility were not included in the City’s GIS (see Appendix 6, Photographs 1 and 2, and Appendix 5, Exhibit 2). In addition, the EPA Inspection Team observed two outfalls to College Creek which were not mapped (see Appendix X, Photographs 3 and 4, and Appendix 5, Exhibit 3).

City representatives stated they were aware that the map was incomplete, and updating the GIS system to include all stormwater assets had been identified as part of the City’s capital improvement plan (CIP). At the time of the inspection, a timeline had not been set on its completion.

Permit Parts III.C.3–4 (Field Screening and Source Identification) – At a minimum, a program developed to implement IDDE to satisfy this control measure shall contain procedures to field screen storm drain outfalls on a consistent basis as well as inspection procedures for identifying the source of any suspected illicit discharges to the storm drain system.

Observation 2: It appears that the City had not developed procedures for field screening storm drain outfalls on a consistent basis. The City had not identified each outfall to be included in the City's outfall screening activities. The two unmapped outfalls to College Creek from Observation 1 were not included in the rotational field screening of storm drain outfalls. The City's Lead Stormwater Inspector stated that he was aware of the outfalls' existence, but was unsure the last time the outfalls had been screened.

City representatives explained that the City conducts outfall screening at approximately 35 of its public outfalls approximately every three to six months; however, it appeared that there was not a set schedule for conducting outfall inspections. Further, the City had not implemented a schedule or standard operating procedure (SOP) for the timing of the outfall inspections.

The City's Lead Stormwater Inspector explained that outfall screening activities have been conducted during dry and wet weather and primarily focused on inspecting outfalls for structural integrity and identifying maintenance needs rather than identifying potential illicit discharges. He explained that outfall screening activities were documented with the City's *Storm Water Management Information Report* form (see Appendix 5, Exhibit 4); however, the form did not include a location to denote weather conditions, status of the outfalls (i.e., dry or flowing), odors, or other observations.

Observation 3: It appears that the City had not developed inspection procedures for identifying the source of observed illicit discharges to the MS4. The EPA Inspection Team formally requested the City's written procedures to detect and address non-stormwater discharges, but the City did not provide the requested information (see Appendix 5, Exhibit 1, Item No. 12). The City's Lead Stormwater Inspector explained that if he observed an illicit discharge he would attempt to identify the source, try to eliminate the discharge if possible, and report the observed illicit discharge to his supervisor for additional follow up.

Permit Part III.C.5 (Enforcement) – At a minimum, a program developed to implement IDDE to satisfy this control measure shall contain enforcement and penalty procedures.

Observation 4: It appears that the City does not have IDDE enforcement and penalty procedures in the event of a prohibited non-stormwater discharge to the MS4. In 2004 the City updated Section 17.08.260 of the City of Annapolis Municipal Code (City Code) to include a prohibition of non-stormwater discharges to public areas and infrastructure. Specifically, City Code *Chapter 17 (Building and Construction), Ordinance No. O-27-13, Section 17.08.180, Prohibited Discharges*, states that no debris, sediment, wastewater, landscaping/yard waste, refuse, or other pollutant

materials shall be deposited in floodplains, watercourses, public streets, highways, sidewalks, storm drains, or other public thoroughfares.

DNEP has enforcement authority for this ordinance. City staff explained that DNEP staff members typically respond to complaints or notifications of spills in the City, and DPW is involved if needed. In addition, the City would notify the State of an issue if warranted. City staff explained that because the City is relatively small, DNEP staff members are typically able to respond to complaints within one hour, and almost always within four hours. City staff explained that violations and penalties can be assessed by the City for illicit discharges to the MS4 and would be issued on a case-by-case basis, depending on the nature of the violation. It did not appear that the City had tracking procedures or a mechanism to ensure records of the illicit discharge observation and corrective action were generated and maintained.

Permit Part III.C.8 (Non-Stormwater Discharges) – At a minimum, a program developed to implement IDDE to satisfy this control measure shall contain any other components deemed necessary to ensure that non-stormwater discharges to the MS4 are either permitted by MDE under NPDES or eliminated.

Observation 5: The EPA Inspection Team observed a discharge of vehicle wash water to a storm drain inlet at the Annapolis Department of Transportation (ADOT) Facility during a site visit conducted on December 12, 2013. Additional details regarding the site visit and the observed discharge to the MS4 are included in Observation 39 of this inspection report.

MINIMUM CONTROL MEASURE 4: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL PROGRAM

Permit Part III.D (Construction Site Stormwater Runoff Control) - The Maryland Environment Article, Title 4, Subtitle 1, *Annotated Code of Maryland* establishes a statewide erosion and sediment control program to control construction site stormwater runoff. This statute, coupled with the COMAR, specifies the requirements for any construction activity that disturbs 5,000 square feet or more of earth.

COMAR 26.17.01.02 (General Provisions) states that an acceptable erosion and sediment control program will include:

1. *An effective erosion and sediment control ordinance (or an effective set of erosion and sediment control regulations) which has been approved by MDE.*
2. *Review and approval of erosion and sediment control plans in accordance with the “2011 Maryland Standards and Specification for Soil Erosion and Sediment Control.”*
3. *Requirements for erosion and sediment control plans to provide effective erosion and sediment control strategies (i.e., BMPs) and information necessary to enable the proper installation and maintenance of these strategies.*

4. *In delegated jurisdictions, inspection and enforcement procedures that ensure compliance with the approved erosion and sediment control plan, as well as provide for timely response to citizen complaints.*

COMAR 26.17.01.11 states that the *2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control* shall serve as the official guide for erosion and sediment control principles, methods, and practices.

COMAR 26.17.01.09 (Inspection and Enforcement) – This regulation requires the appropriate enforcement authority to inspect sites with an approved erosion and sediment control plan an average of once every two weeks for compliance with the approved plan. Further, this regulation states the following concerning erosion and sediment control inspection and enforcement:

When conducting an inspection, the appropriate enforcement authority shall:

1. *Ensure that an approved erosion and sediment control plan and permits are on the site as required;*
2. *Conduct a complete inspection of the site unless otherwise indicated;*
3. *Prepare a written inspection report that includes:*
 - a. *The date and location of this site inspection;*
 - b. *Whether the approved plan has been properly implemented and maintained;*
 - c. *Practice deficiencies or erosion and sediment control plan deficiencies;*
 - d. *If a violation exists, the type of enforcement action taken; and*
 - e. *If applicable, a description of minor or major modifications as described in this regulation; and*
4. *Notify the on-site personnel and the owner/developer in writing when violations are observed, describing the:*
 - a. *Nature of the violation;*
 - b. *Required corrective action; and*
 - c. *Time period in which to have the violation corrected.*

COMAR 26.17.01.09 further requires the appropriate enforcement authority to accept and investigate complaints regarding erosion and sediment control concerns from any interested party. The enforcement authority is to conduct an initial investigation within three working days of receipt of the complaint; notify the complainant of the initial investigation and findings within seven days of receipt of the complaint; and take appropriate action when violations are discovered during the course of the complaint investigation.

Observation 6: It appears that the City is not inspecting sites with approved erosion and sediment control plans an average of once every two weeks. City staff explained that when grading permits are active, the City attempts to conduct ESC inspections at construction sites at least once every two weeks, and approximately once per month when grading permits are inactive. However, multiple instances were noted where inspections were conducted more than two weeks apart.

The City had one dedicated erosion and sediment control inspector (i.e., the City's Environmental Compliance Inspector) to conduct inspections at active construction sites. City staff explained that there were between 20 and 30 active construction sites in the City at the time of the onsite inspection. City staff stated that they have recently had about 10 to 12 sites with active grading operations at any given time.

During the onsite inspection, City staff provided the EPA Inspection Team with information from the City's TrakIt system displaying the dates on which the City conducted inspections at construction sites within its purview (see Appendix 5, Exhibit 7). The EPA Inspection Team reviewed the information for the Annapolis Elementary School and Mills-Parole Elementary School construction projects to compare the dates of erosion and sediment controls inspections with the City's stated two-week, average inspection frequency. Multiple instances were noted where inspections were conducted more than two weeks apart. Tables 2 and 3 provide a summary of the review.

Table 2. Annapolis Elementary School – ESC Inspection Dates and Frequency

Inspection Date	Days between Inspections
8/27/2012	-
9/20/2012	24
10/2/2012	12
10/19/2012	17
10/26/2012	7
10/31/2012	5
12/18/2012	48
1/30/2013	43
2/4/2013	5
2/26/2013	22
3/6/2013	8
5/10/2013	65
7/2/2013	53
7/31/2013	29
8/16/2013	16
9/6/2013	21
9/19/2013	13
10/25/2013	36
11/7/2013	13
11/14/2013	7
11/25/2013	11
Average	22.8 days

Table 3. Mills-Parole Elementary School – ESC Inspection Dates and Frequency

Inspection Date	Days between Inspections
6/7/2013	-
6/18/2013	11
6/24/2013	6
7/12/2013	18
7/31/2013	19
8/9/2013	9
8/22/2013	13
9/5/2013	14
9/19/2013	14
10/14/2013	25
10/25/2013	11
11/1/2013	7
11/14/2013	13
11/26/2013	12
Average	13.2

Observation 7:

At the time of the inspection, the City was not preparing written inspection reports or notifying the on-site personnel and the owner/developer in writing when violations are observed at construction sites. During the onsite inspection, the City's Environmental Compliance Inspector explained the following to the EPA Inspection Team regarding his inspection and enforcement process:

- a. Construction projects can either "pass" or "fail" erosion and sediment control inspections. If there are any ESC issues, then the project fails the inspection. If there is a repeat violation or discharge of sediment from a site, then the project fails the inspection and will likely be assessed a fine.
- b. The contractor's erosion and sediment control inspection records are not typically reviewed unless there is a significant issue at the project.
- c. The City's Environmental Compliance Inspector can authorize several minor modifications for ESC plans, rather than requiring the project to obtain authorization from the Anne Arundel SCD. Appendix 5, Exhibit 6 includes a list of those items as provided by the City's Environmental Compliance Inspector.
- d. The City's Environmental Compliance Inspector maintains an electronic spreadsheet to keep track of his inspections and documented or outstanding issues requiring correction. Inspections are also entered into the City's electronic TrakIt system.

Multiple site deficiencies were observed during the site visits, and in response, the City's Environmental Compliance Inspector documented these issues. He stated that he uses a log to track inspection and sometimes notifies the site owners or operators verbally on-site or by phone when violations are observed as well as to require corrective action. A spreadsheet generated by the City's Environmental Compliance Inspector which identifies some deficiencies and follow-up actions is included as Appendix 5, Exhibit 8. Copies of additional documentation from the City (e.g., citations, transmittal letters, and photographs) are included as Appendix 5, Exhibit 9.

Observation 8: The City does not have an enforcement response plan or other procedural document describing when and how enforcement is to be escalated and how penalties are to be assessed. According to City staff, the municipality's Erosion and Sediment Control Ordinance provides enforcement tools to authorized City staff. It did not appear that the City had an enforcement response plan or other procedural document describing when and how enforcement is to be escalated and how penalties are to be assessed. City staff explained the City's Environmental Compliance Inspector had authority to issue citations for issues related to erosion and sediment control. The City's Environmental Compliance Inspector explained that he escalates enforcement with "field correction notices" and "citations" with fines on a case-by-case basis, depending on the nature of the violation and history of a particular project.

Observation 9: Private Construction Site – Annapolis Elementary School

City staff explained the Annapolis Elementary School is owned by Anne Arundel County Public Schools (AACPS). The school is located in the downtown area to the northwest of the intersection of Compromise Street and Newman Street. Jacobs Engineering was the construction manager for AACPS and Urban Zink was the prime contractor for the project. The project consisted of renovation of and addition to the existing school building and had a disturbed area of 1.73 acres. The Site Manager stated that construction activities commenced in September 2012 and were expected to be complete by August 2014. The project's erosion sediment control plan was originally approved by the Anne Arundel SCD on June 6, 2012, and the project had obtained coverage under MDE's *General Permit for Stormwater Associated with Construction Activity* (NPDES Permit No. MDR10; State Permit No. 09GP; Registration No. 12AA0053) on August 6, 2012.

During the onsite inspection, the City's Environmental Compliance Inspector explained his process for conducting a typical erosion and sediment control inspection. The EPA Inspection Team and City staff discussed site observations during the site visit. The following was

observed with regard to erosion and sediment controls at the construction site:

- a. Perimeter control BMPs were not present along an area of disturbed soil on the northwestern edge of the site (see Appendix 6, Photograph 5). Adjacent to this area was a fiber roll BMP on which sediment had accumulated to a height greater than one half the height of the fiber roll (see Appendix 6, Photographs 6, 7, and 8). The Site Manager explained that this area had been disturbed the day prior to the EPA Inspection Team's site visit, and stated they would install additional fiber roll BMPs for the corner area and clean the accumulated sediment from the adjacent length of fiber roll.
- b. Sediment from vehicle tracking was present on the impervious ground surface on the interior of the site, upgradient of the main construction site entrance (see Appendix 6, Photographs 9 and 10). Unstabilized areas upgradient of the interior impervious area were being used for vehicle and equipment access at the time of the site visit (see Appendix 6, Photographs 11 and 12). The City's Environmental Compliance Inspector discussed this observation with the Site Manager and explained the upgradient access areas should be temporarily stabilized, with rock or otherwise. There were no storm drain inlets observed in this immediate area, however, accumulated sediment was observed within the rock-lined construction entrance (see Appendix 6, Photographs 13 and 14). The construction entrance was equipped with a grated area and hose for spraying off vehicle tires before vehicles exit the site. Further, the Site Manager stated that the project had a street sweeper which sweeps the interior of the site and the three streets adjacent to the site every day.
- c. Filter fabric installed on a storm drain inlet approximately 100 feet to the northwest of the construction entrance did not entirely cover the storm drain inlet (see Appendix 6, Photographs 15 and 16). The City's Environmental Compliance Inspector discussed this with the Site Manager who stated the filter fabric would be replaced.

Observation 10: Private Construction Site – 1109 Boucher Place

The overall Boucher Place construction project consisted of multiple units in a common plan of development; construction started in 2009 or 2010. At the time of the site visit, Lot 8, located at 1109 Boucher Place, was under active construction (see Appendix 6, Photograph 17). The City's Environmental Compliance Inspector stated that the project was owned by Basheer, Edgemoore, Lonergan, LLC.

The EPA Inspection Team and City staff discussed site observations during the site visit. The following was observed with regard to erosion and sediment controls at the construction site:

- a. A length of super silt fence along the northern perimeter of the site on Boucher Place had collapsed (see Appendix 6, Photographs 18, 19,

and 20). The City's Environmental Compliance Inspector stated that it appeared to him that a vehicle or piece of equipment had driven over the silt fence.

- b. Accumulated sediment was present around a storm drain inlet equipped with filter fabric for inlet protection in the alley along the southeastern boundary of the lot (see [Appendix 6, Photograph 21](#)). The City's Environmental Compliance Inspector explained he thought sediment needed to be removed and the filter fabric inlet protection needed to be replaced. In addition, an unsecured portable toilet was located close to the storm drain inlet (see [Appendix 6, Photograph 22](#)).
- c. Sediment was present on the impervious alley surface along the southeastern boundary of the lot (see [Appendix 6, Photograph 23](#)). The City's Environmental Compliance Inspector noted that this area should be swept to remove the sediment.

Observation 11: Private Construction Site – Mills-Parole Elementary School

City staff explained the Mills-Parole Elementary School is owned by AACPS. The school is located at 103 Chinquapin Round Road, Annapolis, Maryland. The project consisted of renovation of and addition to the existing school building and had a disturbed area of 9.0 acres. Oak Contracting, LLC was the construction manager for AACPS for the project. The Project Superintendent (Mr. Eric Green, Oak Contracting, LLC) stated that there are 16 contractors on the project and Dirt Express Company was the site work contractor. The Project Superintendent stated the first of five phases of construction work on the project started in June 2013. The project was expected to be complete by the end of 2014. A copy of the project's erosion and sediment control plan was maintained onsite and had a "green stamp" approval from Anne Arundel SCD dated April 26, 2013.

During the onsite inspection, the City's Environmental Compliance Inspector explained his process for conducting a typical erosion and sediment control inspection. The EPA Inspection Team and City staff discussed site observations during the site visit. The following was observed with regard to erosion and sediment controls at the construction site:

- a. A soil stockpile in the southern portion of the site was uncovered (see [Appendix 6, Photograph 24](#)).
- b. Plastic sheeting material used to prevent stormwater run-on from the adjacent property in the southern portion of the site was deteriorated and pieces of the material were present on the ground surface (see [Appendix 6, Photographs 25, 26, and 27](#)).
- c. Construction dewatering activities, in the area of the generator room in the northern portion of the site, had occurred without filtering the water before discharging it offsite (see [Appendix 6, Photographs 28,](#)

29, and 30). The Project Superintendent stated that a filter bag should have been used and he contacted the staff member responsible for the dewatering while the EPA Inspection Team and City staff were present during the site visit.

- d. Rills and evidence of erosion were present underneath erosion control matting installed on the slopes of a sedimentation basin near the southwestern corner of the site (see Appendix 6, Photographs 31, 32, and 33). In addition, there were several areas of disturbed ground surface which had not been stabilized along the slopes of the basin (see Appendix 6, Photograph 34). Accumulated sediment was observed in the rock-lined drainage channel leading into the basin on its northern side (see Appendix 6, Photographs 35 and 36).

Observation 12: Public Construction Site – East Port Fire Station

The East Port Fire Station is located at 914 Bay Ridge Avenue, Annapolis, Maryland. It is owned by the City and the construction project included the construction of a new storage structure and installation of rain gardens for permanent stormwater management. The project had a disturbed area of 0.59 acre and construction was complete at the time of the site visit. The City's Environmental Compliance Inspector stated that the final stabilization inspection had not been conducted as of the time of the site visit. During the site visit he identified the following issues that the City would need to address:

- a. Several disturbed areas had inadequate coverage and needed further application of grass seed and straw (see Appendix 6, Photographs 37 and 38).
- b. The silt fence should be extended on the southeastern side of the rain garden in the southern portion of the site (see Appendix 6, Photographs 39 and 40).
- c. Rock used for storm drain inlet protection in the impervious parking area should be removed once additional straw and seed are applied at the site (see Appendix 6, Photograph 41).
- d. Silt fence around a soil stockpile should be entrenched or the stockpile should be removed and the disturbed area should be stabilized (see Appendix 6, Photographs 42 and 43).
- e. Erosion matting should be installed upgradient of the rain garden on the northern side of the new storage structure (see Appendix 6, Photograph 44).

MINIMUM CONTROL MEASURE 5: POST-CONSTRUCTION STORMWATER MANAGEMENT PROGRAM

Permit Part III.E (Post-Construction Stormwater Management) – The Maryland Environment Article, Title 4, Subtitle 2, *Annotated Code of Maryland* (hereinafter, Stormwater Management Subtitle) which establishes a statewide stormwater management program. This statute, coupled with COMAR, requires that stormwater management for new development and

redevelopment be addressed for any proposed project that disturbs 5,000 square feet or more of earth.

COMAR 26.17.02.03 states that an acceptable stormwater management program will include:

1. *A Water Management Administration-approved [MDE-approved] stormwater management ordinance.*
2. *Stormwater management planning and approval processes that provide stormwater management for every land development subject to COMAR 26.17.02, implementation of environmental site design (ESD) to the maximum extent practicable (MEP), and the ability and the information necessary to review adequately proposed installation and maintenance measures for stormwater management.*
3. *Inspection and enforcement procedures that ensure the proper construction and maintenance of approved stormwater management measures.*

COMAR 26.17.02.11 (Inspection and Maintenance) – This regulation states the following concerning post-construction stormwater management facility maintenance and routine inspections:

Maintenance requirements established in this regulation shall be contained in all county and municipal ordinances and shall provide for inspection and maintenance. The owner shall perform or cause to be performed preventive maintenance of all completed ESD treatment practices and structural stormwater management measures to ensure proper functioning. The responsible agency of the county or municipality shall ensure preventive maintenance through inspection of all stormwater management systems. The inspection shall occur during the first year of operation and then at least once every 3 years after that.

Observation 13: At the time of the inspection, the City was not ensuring preventive maintenance through inspection of all stormwater management systems during the first year of operation and then at least once every 3 years after. City management and staff explained that the City did not have an inventory of all post-construction BMPs within the City in order to inspect all systems. Post-construction BMPs may be identified in the City's electronic iWorQ maintenance management system or the City's TrakIt system. In addition, smaller post-construction BMPs which have been installed on private residential properties may be captured in the City's inventory. City staff estimated there were about 36 public post-construction BMPs in the City. The City's DNEP Director explained that DNEP has requested funding through the City's CIP budget to electronically inventory and track the location and status of post-construction BMPs. The City's Chief of Environmental Programs added that this is mostly driven by the state's nutrient reduction goals and keeping track of those BMPs for nutrient reduction credit.

The City's Stormwater Engineer explained that the City primarily conducts post-construction BMP inspections in response to complaints or to reduce or release the property owner's construction surety bond. The

City's Stormwater Engineer was in the process of developing a system for evaluating and ensuring the proper function of post-construction BMPs. He also explained that the maintenance of private stormwater management facilities is the responsibility of the BMP owner.

In addition, City management and staff stated that inspection and maintenance of City-owned stormwater management facilities located on the properties operated by those different City agencies are the responsibility of that agency. DNEP staff are available for consult. The City conducts maintenance on some public post-construction BMPs in the City (e.g., rain gardens) while DPW is responsible for maintenance on other City-owned BMPs, such as stormwater management ponds. The City's Lead Stormwater Inspector from DPW stated he conducts inspections of the City's stormwater management ponds. He explained that during the pond inspection he looks for issues such as erosion and illegal dumping, but he had not been provided with formal training on how to assess the functionality and condition of the ponds.

At the time of the inspection, the City Parks Division did not have an inventory of the BMPs on their properties and were not conducting inspections. During a site visit to the Truxtun Park BMPs, the City's Director of Parks and Recreation explained that his staff responsible for maintaining rain gardens at City parks had not been provided with formal training on how to perform inspections or maintenance on rain garden BMPs and they did not have access to the as-built plans, design specifications or operation and maintenance requirements.

Observation 14: Public Stormwater Management Facility – Taylor Avenue Stormwater Management Pond

City staff explained the stormwater management pond was installed more than 10 years prior to the inspection and discharges to an unnamed tributary to College Creek.

The EPA Inspection Team observed the following at the stormwater management facility:

- a. Accumulated sediment and an eroded channel were observed near the northern inlet to the stormwater water management pond (see Appendix 6, Photographs 45, 46, and 47).
- b. Significant vegetation was observed within the interior of the pond (see Appendix 6, Photographs 48 and 49).
- c. The pond's primary outfall structure was to an adjacent channel, which flowed to College Creek (see Appendix 6, Photograph 50).

Observation 15: Public Stormwater Management Facility – Truxtun Park BMPs

Two landscape infiltration basins (also referred to as “rain gardens” by City staff; [see Appendix 6, Photographs 51 and 52](#)) were located at the City’s Pip Moyer Recreation Center at Truxtun Park. City staff stated the recreation center was built in about 2009 and the stormwater management facilities were installed as part of that construction project. During the site visit, the EPA Inspection Team noted a drainage channel along the north side of the baseball field had been disturbed and sediment was present in and around the channel, upgradient of one of the landscape infiltration basins ([see Appendix 6, Photographs 53 and 54](#)). City staff explained sediment from the baseball field had accumulated in the drainage channel and City maintenance staff dug it out in October 2013. City staff stated that they planned to re-grade the baseball field, which should help reduce the transport of sediment in this area.

Observation 16: Private Stormwater Management Facility – Harness Creek View Stormwater Management Pond

City staff explained the stormwater management pond ([see Appendix 6, Photograph 55](#)) was installed about 10 to 15 years prior to the inspection and serves about 28 homes in the development. The pond is owned by the homeowner’s association (HOA). The City’s Stormwater Engineer (Mr. Matthew Waters) identified the following potential issues with the stormwater management pond:

- a. Rip rap was not present at the inlet to the stormwater management pond and may need to be added ([see Appendix 6, Photograph 56](#)).
- b. The “baffle” structure near the inlet to the pond may need to be extended ([see Appendix 6, Photograph 57](#)).
- c. Trees had been planted and established on the eastern bank of the pond. These trees may add additional debris (i.e., leaves and branches) to the pond and their roots could compromise the structural integrity of the bank ([see Appendix 6, Photograph 58](#)).

Observation 17: Private Stormwater Management Facility – 1292 Spa Road Rain Garden

The City’s Stormwater Engineer (Mr. Matthew Waters) explained he had conducted an inspection at this facility ([see Appendix 6, Photograph 59](#)) about four months prior to the EPA Inspection Team’s site visit. During the site visit with the EPA Inspection Team, he used a cleanout access and a ruler to gauge the depth of standing water beneath the ground surface in the rain garden. He noted there was about six inches of standing water in the cleanout, which may indicate there is an issue with the BMP holding water and not allowing proper infiltration. It should be noted that snow was still present on the ground surface at the time of the site visit.

MINIMUM CONTROL MEASURE 6: POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Permit Part III.F (Pollution Prevention and Good Housekeeping) – Permittees shall implement and maintain pollution prevention and good housekeeping techniques and procedures to reduce pollutants from all municipal operations. Components of this minimum control measure shall include municipal employee training materials to prevent and reduce pollutant discharges to the storm drain system, runoff controls geared toward fleet yard and building maintenance activities, and ensuring all municipally owned activities are properly permitted under NPDES or any other state or federal water pollution control programs. Permittees shall develop pollution prevention or good housekeeping procedures themselves or rely on another responsible entity to comply with this minimum control measure.

- Observation 18:** At the time of the inspection, the City had not developed employee training materials that explain how to prevent and reduce pollutant discharges to the storm drain system from the DPW Operations Facility and ADOT Facility. The DPW Services Superintendent stated that the Spa Road Facility (DPW Operations) has not provided training to its employees for stormwater or pollution prevention and good housekeeping at the facility. He further stated that training for City operations and maintenance staff was primarily “on-the-job.” The City’s DPW Services Superintendent, Superintendent of Utilities, and Lead Stormwater Inspector stated that they had not received stormwater or pollution prevention and good housekeeping training. The ADOT Transportation Planner stated that ADOT had not provided stormwater or pollution prevention and good housekeeping training to its employees.
- Observation 19:** It appears that the City had not developed pollution prevention or good housekeeping procedures for each of its municipal operations facilities. The City’s DPW Services Superintendent explained that the City institutes general good housekeeping practices at its municipal operations facilities, but the City had not developed written plans for each of the facilities or a manual for pollution prevention and good housekeeping BMP implementation.
- Observation 20:** At the time of the inspection, the City had not ensured that all municipally owned activities are properly permitted under NPDES or other state or federal water pollution control programs. The DNEP Director stated that she was unaware whether an NPDES general permit or a stormwater pollution prevention plan (SWPPP) was required for any municipal facilities owned and managed by the City; therefore, the City had not obtained coverage for its facilities under MDE’s *General Discharge Permit for Stormwater Associated with Industrial Activities* (Discharge Permit No. 02-SW; hereinafter, Industrial General Permit).
- Observation 21:** **Spa Road Maintenance Facility**

The Spa Road Maintenance Facility is located within the City, and includes both 932 Spa Road (located on the west side of Spa Road) and 935 Spa Road (located on the east side of Spa Road; collectively hereinafter, Spa Road Facility). City staff explained that public works operations for the City are based out of the Spa Road Maintenance Facility.

The EPA Inspection Team observed the following with regard to overall pollution prevention and good housekeeping at the facility:

- a. The City had not developed a SWPPP or obtained covered under MDE's *General Discharge Permit for Stormwater Associated with Industrial Activities*.
- b. According to staff, training occurs as on-the-job training. Training is not provided to the staff or superintendents specifically for stormwater pollution prevention/good housekeeping techniques.
- c. The City's GIS map identifies major storm drain pipes outside of the facility, but does not contain all of the storm drain inlets and pipes within the facility (see Appendix 5, Exhibit 3).
- d. The City was not able to produce a map or schematic displaying the drainage system of the facility during the onsite inspection. Stormwater appeared to drain from the 932 Spa Road Facility to either an open swale that leads ultimately to Spa Creek, or to a number of storm drain inlets located on the southeast side of the facility. The City's Superintendent of Utilities stated that stormwater primarily drains from the 935 Spa Road Facility to three interceptors located on the southern portion of the site. The back storage yard at 935 Spa Road contains the City's Vactor® truck decant storage area, with a drain that is connected to the sanitary sewer system. Stormwater from the back storage yard flows to two storm drain inlets located at the southeast corner and ultimately to Spa Creek located immediately to the south of the Spa Road Facility (see Appendix 6, Photographs 60 through 64).
- e. The City did not appear to have a set schedule to maintain the three interceptors or BMPs used for the storm drain inlet protection (e.g., absorbent rolls, straw bales, fabric inlet protectors). City staff explained the interceptors are inspected and cleaned on a rotational basis.

932 Spa Road to the West of Spa Road

Types of activities conducted at 932 Spa Road include fleet maintenance, traffic control equipment storage and maintenance, vehicle equipment storage, salt storage, used oil and antifreeze storage, and employee vehicle parking.

The EPA Inspection Team observed the following with regard to pollution prevention and good housekeeping at the 932 Spa Road Facility and discussed the observations with the City representatives during the site visit.

- f. Inlet protection located in the southeast corner of the facility did not encompass the entire grate on the upstream side of the storm drain inlet; consequently stormwater from the material storage and equipment storage yards could bypass the BMPs (see Appendix 6, Photographs 65, 66, and 67).
- g. A 55-gallon drum labeled as containing used antifreeze was stored outdoors and without coverage or containment (see Appendix 6, Photograph 68).
- h. A drainage swale down gradient of the facility's materials stockpile area, salt dome, and vehicle storage area contained sediment and turbid water (see Appendix 6, Photograph 69).

935 Spa Road to the East of Spa Road

Types of activities at 935 Spa Road include vehicle washing, vehicle fueling, and recycled materials storage. The facility also houses offices, City equipment, Vactor® decant, and street sweeping and trash storage located in an area known as the "back storage yard" at the southeast corner of the property.

The EPA Inspection Team observed the following with regard to pollution prevention and good housekeeping at the 935 Spa Road Facility and discussed the observations with the City representatives during the site visit.

- i. The Facility did not contain a spill kit for hazardous materials. City staff explained that spill cleanup materials such as spill stay-dry and absorbent pads are stored at the 932 Spa Road Facility, and are brought over on an as-needed basis. It should be noted that the DPW Services had ordered spill cleanup kits for the 935 Spa Road Facility, as well as for many of the City maintenance vehicles, prior to the end of the EPA inspection.
- j. Waste from the City's street sweepers was sorted in the back storage yard located at the southeast side of the facility (see Appendix 6, Photograph 70). City staff explained that from November to January of each year, street sweeping waste is sorted for leaves and trash. Leaves are stored at the facility, and the trash from the street sweepers is disposed of as waste in a dumpster. The EPA Inspection Team observed that the street sweeping sorting activity occurs near a storm drain inlet, and City staff explained that the street sweeping vehicles are also rinsed out with water near this storm drain inlet (see Appendix 6, Photograph 71). Accumulated sediment was observed in the outfall

from this storm drain inlet, and sediment had accumulated downstream of the outfall leading to Spa Creek (see Appendix 6, Photograph 72). City staff stated that they would begin rinsing the street sweepers in the designated vehicle wash area located inside of the facility.

- k. Material stockpiles were located throughout the back storage yard area located along the southeast side of the facility (see Appendix 6, Photographs 73 and 74). City DPW staff stated the stockpiles consisted mostly of sand and soil with some woody materials and debris from City maintenance activities. Stormwater runoff from this area appeared to drain to the southeast to a stormwater drain inlet and ultimately to an outfall leading to Spa Creek.

Observation 22: Annapolis Department of Transportation Facility (ADOT)

The ADOT Facility is located at 308 Chinquapin Round Road, Annapolis, Maryland. The Facility consists of a bus maintenance shop, bus wash station, administrative offices, transit vehicle parking areas, waste disposal and storage area, and areas for visitor and employee parking.

The ADOT Transportation Planner stated that the facility maintains one oil-water separator from the bus washing facility that conveys flow to the sanitary sewer system. Stormwater runoff from the facility is ultimately discharged to the storm sewer system on Chinquapin Round Road. Appendix 5, Exhibit 11 is a schematic of the facility identifying drainage provided by the City subsequent to the onsite inspection.

The EPA Inspection Team observed the following with regard to pollution prevention and good housekeeping at the ADOT Facility and discussed the observations with the City representatives during the site visit.

- a. The City had not developed an SWPPP or obtained coverage under MDE's *General Discharge Permit for Stormwater Associated with Industrial Activities*.
- b. The City's GIS system contains the major storm sewers outside of the facility, but does not contain all of the storm drains the EPA Inspection Team observed within the facility.
- c. At the time of the site visit, ADOT Facility staff members were washing some of the facility's vehicles outside of the designated bus wash building on an impervious surface leading to a storm drain inlet (see Appendix 6, Photographs 75 and 76). Soapy water was observed entering the storm drain inlet. The ADOT Transportation Planner explained that approximately 20 percent of the City's buses are washed outside of the designated bus washing building because some of the new buses are too large for the current bus wash building. Salt residue in the area where bus washing occurred was observed on the impervious surface, which led to the storm drain inlet located immediately west of the bus wash building (see Appendix 6,

Photograph 77). City staff explained that plans were being developed under the City's CIP for upgrading the bus wash building to allow for the larger vehicles. It did not appear that a timeline had been set on the completion of the bus wash building upgrade.

- d. Three 55-gallon drums labeled as containing petroleum products were stored without coverage or containment located to the east of the bus maintenance building (see Appendix 6, Photograph 78). One drum was stored upside down and the EPA Inspection Team observed evidence of material leaking from the drum (see Appendix 6, Photograph 79). The EPA inspection team observed staining on the impervious surface at the location of the drum to a down gradient storm drain inlet (see Appendix 6, Photographs 80, 81, and 82). ADOT Facility staff explained that used oil drums were sometimes stored outside of the bus maintenance building prior to pick up by an outside contractor. They were unsure why the barrel was placed upside down and leaking, or how long the barrel had been leaking.
- e. The ADOT Facility did not have a schedule to maintain the bus wash building interceptor. The ADOT Transportation Planner explained that a contractor maintains the interceptor, and it is inspected and cleaned when the contractor determines it is necessary.
- f. Absorbent material applied in the waste oil disposal and storage area had not been cleaned up and staining was present on the impervious surface (see Appendix 6, Photograph 83). ADOT staff explained that one of the 55-gallon drums had leaked a week or so ago, and it appeared that the bus maintenance staff did not clean up the absorbent pads or the spilled material residue on the asphalt. The leaking 55-gallon drum had been placed in a metal drum tote that was sealed so no additional leaking would occur. Absorbent material was present around the waste oil storage structure and a container labeled as containing used antifreeze was stored outside and without coverage or containment (see Appendix 6, Photograph 84).